

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CENTRAL LABORERS PENSION FUND,	)	
et al.,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 15 C 1921
vs.	)	
	)	JUDGE ANDREA R. WOOD
HERB J. FISHBURN, an individual,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, HERB J. FISHBURN, an individual, in the total amount of \$4,687.20, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,111.50.

On March 25, 2015, the Alias Summons and Complaint was served on the Defendant by substitute service (by tendering a copy of said documents to Shari Fishburn) at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on April 15, 2015. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon  
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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 30th day of April 2015:

Mr. Herb J. Fishburn  
26460 S. McKinley Woods Road  
Channahon, IL 60410-9339

/s/ Cecilia M. Scanlon \_\_\_\_\_

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